

APR 17 2014

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

ROBERT JAMES TALBOT, JR.

§
§
§
§
§
§
§
§

Criminal No.

14-169**INDICTMENT**

The Grand Jury in and for the Southern District of Texas, sitting at Houston, charges:

Count One**Attempted Interference with Commerce by Robbery and Aiding & Abetting**
Title 18, United States Code, Sections 1951(a) & 2**A. Introduction**

At all times material to this Indictment:

1. On or about August 21, 2013, a Federal Bureau of Investigation's ("F.B.I.") confidential human source ("CHS"), also known as "Will Richards II," contacted Facebook user name "Roberts Liberty" online. The F.B.I.'s investigation later revealed that "Roberts Liberty" to be the defendant, **ROBERT JAMES TALBOT, JR.**, hereinafter "**TALBOT.**" **TALBOT** provided the CHS with a contact number of (585) xxx-xx37 and told the CHS to contact him on that number.
2. On or about August 23, 2013, CHS contacted **TALBOT** by telephone. **TALBOT** advised the CHS he had converted his personal AK-47 from semiautomatic to full automatic. **TALBOT** further offered to convert the CHS's gun to full automatic. **TALBOT** asked the CHS to join him and five (5) to six (6) others in **TALBOT's** plans to attack the "collars" in Washington, D.C. and take back the government by force. The

CHS told **TALBOT** that he would join him. **TALBOT** further stated to the CHS in the same conversation that prior to engaging their primary targets in Washington, D.C.; the group would conduct two (2) to three (3) training missions at mosques that **TALBOT** had already identified. **TALBOT** told the CHS they would attack the mosques when they were full of people and kill as many men, women, and children as possible. **TALBOT** has advocated robbing banks to obtain funds to purchase additional weapons and ammunition.

3. On or about November 21, 2013, **TALBOT** notified an online undercover F.B.I. employee that he (**Talbot**) created a Facebook page titled "American Insurgent Movement." **TALBOT** created the American Insurgent Movement (AIM) Facebook page to recruit likeminded individuals to "fight for the cause." Talbot described AIM as "a Pre-Constitutionalist Community that offers those who seek True Patriotism and are looking for absolute Freedom by doing the Will of God. Who want to restore America Pre-Constitutionally and look forward to stopping the Regime with action by bloodshed. To remove those by force whom don't agree with the Restoration of the Republic and work with the "powers that be" by use of the Declaration of Independence."
4. On or about January 4, 2014, **TALBOT** legally purchased a Glock model 31, .357 caliber hand gun from a gun store in Houston, Texas.
5. On or about January 7, 2014, during an online chat, **TALBOT** told the CHS to start looking at Bank of America and Chase banks that they can start to hit. **TALBOT** explained they need "funds for our operations and I need larger weapons which I can get my hands on."

6. **TALBOT** met with FBI Under Cover Employee (“UCE”) - 4452 and UCE - 4966 on or about January 22, 2014. **TALBOT** discussed his continued plans to rob banks and spoke specifically about his surveillance of multiple bank locations in the greater Houston area. **TALBOT** solicited both UCE-4452, known to the Defendant as “Ray” and UCE-4966, known to the Defendant as “Billy,” to join him in his “American Insurgent Movement.” **TALBOT** told UCE-4452 and UCE-4966 that he was willing to manufacture silencers for their firearms. **TALBOT** asked UCE-4452 and UCE-4966 to provide him cash up front, along with the make and models of their firearms, and he will purchase the parts necessary for him to make the illegal silencers. **TALBOT** further discussed that they will use their silencers during the commission of bank robberies. Both FBI UCEs conveyed to **TALBOT** that were “like-minded,” agreed with **TALBOT**’s “beliefs” and wanted to join him.
7. On or about March 5, 2014, **TALBOT** as “Roberts Liberty” posted the following message and link on Facebook: “Looks like trucks are a easy target! which makes sense.

<http://www.nbcphiladelphia.com/news/local/Robbers-Steal-310K-in-Armored-Truck-Heist-230041971.html>”
8. On or about March 11, 2014, **TALBOT** on a phone call to UCE-4452 stated he wanted to rob an armored car. He further explained to UCE-4452 how this would occur, that he (**TALBOT**) would “kill the driver and anyone inside.” He further stated that he planned to use C4 explosives on the back doors of the armored car.
9. On or about March 27, 2014, **TALBOT**, with his Glock 31 and a fully loaded 15-round magazine in his backpack, explained to UCE-4452, while UCE-4966 and the CHS

listened, that “You’re going to pull the door open and I’m going to go in and I’m going to make sure the guy is either dead or fuckin’ on the floor with...and I’m fuckin’ going to shoot the son of a bitch...after that I’m goin’ start tossing bags out!”

B. The Entities

10. At all relevant times, Bank of America (“BOA”) owned and operated a bank branch in Houston, Texas located at 7770 Highway 6 North, Houston, Texas. BOA is a company with operations worldwide, including locations in the Americas, Europe, the Middle East and Africa.
11. At all relevant times, the deposits of BOA were insured by the Federal Deposit Insurance Corporation.
12. At all relevant times, Dunbar Armored, Inc. (“Dunbar”) regularly delivered and picked up monies and property of BOA as part of their service contract. Dunbar does business in the State of Texas and throughout the United States. Dunbar employed armed guards and used armored cars to deliver and pick up monies and property of BOA.
13. At all relevant times, the activities of Dunbar affected commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3)
14. From at least on or about January 4, 2014 until March 27, 2014, at Houston, in the Southern District of Texas, and elsewhere, Defendant

ROBERT JAMES TALBOT, JR.,

did knowingly and wilfully attempt to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), specifically the attempted robbery of a Dunbar armored car.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

Count Two
Solicitation to Commit a Crime of Violence
Title 18, United States Code, Section 373(a)

15. The allegations set forth in Paragraphs 1 through 13 of Count 1 are incorporated herein.
16. From on or about August 23, 2013 through on or about March 27, 2014, in the greater Houston area, within the Southern District of Texas,

ROBERT JAMES TALBOT, JR.,

Defendant herein, with the intent that a person, identified herein as the FBI CHS, known to the Defendant as "Will Richards II" engage in conduct constituting a felony that has as an element the use, attempted use, and threatened use of physical force against property and against the person of another in violation of the laws of the United States and under circumstance strongly corroborative of that intent, did solicit and endeavor to persuade the FBI CHS to engage in such conduct – that is, to unlawfully knowingly and wilfully attempt to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), specifically the attempted robbery of a Dunbar armored car, in violation of Title 18, United States Code, Sections 1951(a); all in violation of Title 18, United States Code, Section 373.

NOTICE OF FORFEITURE
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

15. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1951, Section 2, and Section 373, set forth in Counts One and Two of this Indictment, the defendant,


ROBERT JAMES TALBOT, JR.,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), which incorporates Title 21, United States Code, Section 853, any firearm and ammunition involved in or used in any violation of Title 18, United States Code, Section 1951, Section 2, and Section 373, including, but not limited to:

1. a Glock 31 Pistol, S/N: WBB392, seized from defendant in Houston, Texas;
2. 124 rounds of .357 caliber ammunition;
3. 3 magazines -- .357 caliber, 15-round capacity; and
4. 4 magazines -- .40 caliber, 30-round capacity.

A TRUE BILL

Original Signature on File


~~FOR PERSON~~

KENNETH MAGIDSON
UNITED STATES ATTORNEY


CAROLYN FERKO
Assistant United States Attorney